

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
KIMBERLY WASHINGTON : **VIOLATIONS:**
: **21 U.S.C. § 952(a)**
: **(importation of more than 500 grams of**
: **cocaine - 1 count)**
: **(possession with intent to distribute**
more : **than 500 grams of cocaine - 1 count)**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about November 11, 2004, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

KIMBERLY WASHINGTON

knowingly and intentionally imported more than 500 grams, that is, approximately 717.5 grams of
a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled
substance, into the United States, from a place outside the United States.

In violation of Title 21, United States Code, Sections 952(a) and 960(b)(2)(B).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 11, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KIMBERLY WASHINGTON

knowingly and intentionally possessed with intent to distribute more than 500 grams, that is, approximately 717.5 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY